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Attorneys for Defendant
ANDERS CERTIFIED WELDING, INC.

**UNITED STATES DISTRICT COURT
DISTRICT OF OREGON
PORTLAND DIVISION**

TRUSTEES OF THE OREGON-WASHINGTON
CARPENTERS-EMPLOYERS HEALTH AND
WELFARE TRUST FUND, TRUSTEES OF THE
OREGON-WASHINGTON CARPENTERS-
EMPLOYERS PENSION TRUST FUND,
TRUSTEES OF THE OREGON-WASHINGTON
CARPENTERS-EMPLOYERS VACATION-
SAVINGS TRUST FUND, TRUSTEES OF THE
OREGON-WASHINGTON CARPENTERS-
EMPLOYERS APPRENTICESHIP AND
TRAINING TRUST FUND and THE PACIFIC
NORTHWEST REGIONAL COUNCIL OF
CARPENTERS,

Civil No. 10-CV-1047-KI
ANSWER TO FIRST
AMENDED COMPLAINT

Plaintiffs,
v.
ANDERS CERTIFIED WELDING, INC.,

DEMAND FOR JURY TRIAL

Defendant.

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In Answer to Plaintiffs' First Amended Complaint, Defendant admits, denies, and alleges as follows:

1. Defendant admits the allegations contained in paragraph 1 of Plaintiff's First Amended Complaint.
2. Defendant admits the allegations contained in paragraph 2 of Plaintiff's First Amended Complaint.
3. Defendant admits the allegations contained in paragraph 3 of Plaintiff's First Amended Complaint.
4. Defendant admits the allegations contained in paragraph 4 of Plaintiff's First Amended Complaint.
5. Defendant has insufficient information to admit or deny the allegations contained in paragraph 5 of Plaintiff's First Amended Complaint.
6. Defendant has insufficient information to admit or deny the allegations contained in paragraph 6 of Plaintiff's First Amended Complaint.
7. Defendant has insufficient information to admit or deny the allegations contained in paragraph 7 of Plaintiff's First Amended Complaint.
8. Defendant admits the allegations contained in paragraph 8 of Plaintiff's First Amended Complaint.
9. Defendant has insufficient information to admit or deny the allegations contained in paragraph 9 of Plaintiff's First Amended Complaint.
10. Defendant denies the allegations contained in paragraph 10 of Plaintiff's First Amended Complaint.

11. Defendant denies the allegations contained in paragraph 11 of Plaintiff's First Amended Complaint.

12. Defendant denies the allegations contained in paragraph 12 of Plaintiff's First Amended Complaint.

13. Defendant denies the allegations contained in paragraph 13 of Plaintiff's First Amended Complaint.

14. Defendant denies the allegations contained in paragraph 14 of Plaintiff's First Amended Complaint.

BY WAY OF FURTHER ANSWER AND FIRST AFFIRMATIVE DEFENSE,
Defendant alleges as follows:

15. Defendant, to its knowledge, has neither seen, read, nor signed the Trust Agreements that created the Trust Funds provided for in the Plaintiff's First Amended Complaint, set forth in Plaintiff's allegations contained in paragraphs 10 through 12.

DATED: April 19, 2011

WESSON & DUNCAN

By: /s/ Frank S. Wesson
Frank S. Wesson, OSB No. 901341
503-292-5122
Of Attorneys For Defendant

CERTIFICATE OF SERVICE

I hereby certify that I served the foregoing Answer to Complaint by

- U.S. POSTAL SERVICE
- CM/ECF
- FAX/SIMILE SERVICE
- ELECTRONIC MAIL
- ARRANGING FOR HAND DELIVERY
- FEDERAL EXPRESS

Addressed as follows:

Stephen H. Buckley
Cary R. Cadonau
Brownstein Rask, et al.
1200 SW Main Building
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Attorneys for Plaintiffs

On April 19, 2011.

/s/ Frank S. Wesson
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